

CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C.
COUNSELLORS AT LAW

JAN ALAN BRODY
JOHN M. AGNELLO
CHARLES M. CARELLA
JAMES E. CECCHI

CHARLES C. CARELLA
1933 – 2023

DONALD F. MICELI
CARL R. WOODWARD, III
MELISSA E. FLAX
DAVID G. GILFILLAN
G. GLENNON TROUBLEFIELD
BRIAN H. FENLON
CAROLINE F. BARTLETT
ZACHARY S. BOWER+
DONALD A. ECKLUND
CHRISTOPHER H. WESTRICK*
STEPHEN R. DANEK
MICHAEL A. INNES
MEGAN A. NATALE
KEVIN G. COOPER

**5 BECKER FARM ROAD
ROSELAND, N.J. 07068-1739
PHONE (973) 994-1700
FAX (973) 994-1744
www.carellabyrne.com**

PETER G. STEWART
FRANCIS C. HAND
JAMES A. O'BRIEN, III
JOHN G. ESMERADO
STEVEN G. TYSON
MATTHEW J. CERES
ZACHARY A. JACOBS***
JASON H. ALPERSTEIN+ +

RAYMOND J. LILLIE
GREGORY G. MAROTTA
MARYSSA P. GEIST
JORDAN M. STEELE**
ROBERT J. VASQUEZ
BRITTNEY M. MASTRANGELO
GRANT Y. LEE***

OF COUNSEL

*CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY
**MEMBER NY BAR
***MEMBER IL BAR
+MEMBER FL BAR
++ MEMBER NY & FL BAR

October 9, 2024

VIA ECF

Honorable Michael A. Hammer, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Jr. Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

**Re: *In re American Medical Collection Agency, Inc. Customer Data Security
Breach Litigation, No. 19-md-2904(MCA)(MAH)***

Dear Judge Hammer,

I am Interim Lead Counsel for Plaintiffs in the above-referenced matter. Pursuant to Your Honor's MDL Text Order, ECF 732, I write with the consent of Defendants to propose the following schedule for filing the upcoming motions for class certification and any related challenges to the parties' experts:

- March 24 – Plaintiffs to file motions for class certification
- March 25 – Defendants to file briefs in opposition to class certification
- March 26 – Plaintiffs to file reply briefs in support of class certification
- May 13 – All parties to file motions challenging class certification experts
- May 14 – All parties to file briefs in opposition to motions challenging class certification experts
- May 15 – All parties to file reply briefs in support of motions challenging class certification experts

The parties will serve their papers in accordance with the agreed-upon schedule that was previously submitted to Your Honor. ECF 731. If this proposed filing schedule meets with Your Honor's approval, please kindly So Order this letter and return it to the parties through the Court's ECF system.

October 9, 2024

Page 2 of 2

We thank Your Honor for your continued attention to this matter and we are available at the Court's convenience to answer any questions.

Respectfully submitted,

CARELLA BYRNE CECCHI
BRODY & AGNELLO, P.C.

/s/ James E. Cecchi
JAMES E. CECCHI

cc: All counsel of record (via ECF)